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*Proposed Counsel to the Debtors
 and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF NEW YORK**

)	Chapter 11
)	
)	Case No. 19-76260-ast
)	Case No. 19-76263-ast
In re:)	Case No. 19-76267-ast
)	Case No. 19-76268-ast
Absolut Facilities Management, LLC, <i>et al.</i>)	Case No. 19-76269-ast
)	Case No. 19-76270-ast
Debtors. ¹)	Case No. 19-76271-ast
)	Case No. 19-76272-ast
)	
)	(Jointly Administered)
)	

**STIPULATION AND ORDER REGARDING RESPONSE
DEADLINES FOR NOVEMBER 20, 2019 HEARING**

This stipulation and order regarding the briefing deadlines for the November 20, 2019 hearing is made between the above-referenced debtors and debtors-in-possession (the “Debtors”) and the Arba Group and their affiliates (the “Landlord Group”).

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Absolut Facilities Management, LLC (1412); Absolut Center for Nursing and Rehabilitation at Allegany, LLC (7875); Absolut Center for Nursing and Rehabilitation at Aurora Park, LLC (8266); Absolut Center for Nursing and Rehabilitation at Gasport, LLC (8080); Absolut at Orchard Brooke, LLC (1641); Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC (8300); Absolut Center for Nursing and Rehabilitation at Three Rivers, LLC (8133); and Absolut Center for Nursing and Rehabilitation at Westfield, LLC (7924).

WHEREAS, by email dated October 30, 2019, the Court adjourned the following matters scheduled for a hearing on November 4, 2019 at 2:00 p.m. to November 20, 2019² at 2:00 p.m.:

- (Status Only) Motions to Appoint Chapter 11 Trustee [dkt items 69 and 102];
- (Initial) Motion to Approve Closure Plan of Orchard Park Facility [dkt item 51];
- (Initial) Motion to Reject Orchard Park Facility Lease [dkt item 85];
- (Final) DIP and Cash Collateral Motion [dkt item 4];
- Motion to Prohibit/Enjoin/Restrain [Adv. Pro. No. 19-08121 dkt item 3];
- Order to Show Cause [Adv. Pro. No. 19-08121 dkt item 13]; and
- Scheduling Order [Adv. Pro. No. 19-08121 dkt item 15]

(collectively, the “Adjourned Matters”)

NOW WHEREFORE, the Debtors and the Landlord Group stipulate and agree:

1. The deadline to file any response to the Adjourned Matters is hereby extended to November 11, 2019 at 4:00 p.m.
2. The deadline to file any reply to the Adjourned Matters is hereby extended to November 18, 2019 at 4:00 p.m.
3. The foregoing deadlines may be extended by agreement of the parties without further Court order.
4. Absent agreement by the parties, the Landlord Group and the Debtors reserve the right to request relief from the Court (i) further adjourning the Adjourned Matters, and/or (ii) further extending the briefing deadlines; provided that no request by the Landlord Group for an extension of its briefing deadlines shall reduce the amount of time afforded the Debtors to file a reply.

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² Counsel to the Landlords will be requesting a different adjourned hearing date and that their Motion to Appoint Chapter 11 Trustee [dkt item 69] be scheduled to be heard on the same date. All parties reserve their rights in respect of scheduling issues.

Dated: October 31, 2019
New York, New York

LOEB & LOEB LLP

/s/ Schuyler G. Carroll

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Dated: October 31, 2019
New York, New York

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THE FOREGOING IS SO ORDERED

Hon. Alan S. Trust